

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ZAIDA HICKS and STEPHANIE VARGAS individually and on behalf of all others similarly situated,  Plaintiffs, v.  L'OREAL USA, INC.,  Defendant.	<b>Civil Action No.: 22-cv-1989-JPC</b>  <b>COMPLAINT FOR DAMAGES</b>  <b>DEMAND FOR JURY TRIAL</b>
SONIA CAUCHI and STEPHANIE BRANTON individually and on behalf of all others similarly situated,  Plaintiffs, v.  L'OREAL USA, INC.,  Defendant.	<b>Civil Action No.: 22-cv-3926-JPC</b>  <b>COMPLAINT FOR DAMAGES</b>  <b>DEMAND FOR JURY TRIAL</b>

**STIPULATION AND [PROPOSED] ORDER CONSOLIDATING CASES AND  
EXTENDING TIME TO FILE A CONSOLIDATED AMENDED COMPLAINT**

WHEREAS, the matter of *Hicks v. L'Oreal USA, Inc.*, No. 22-cv-1989-JPC was filed on March 9, 2022;

WHEREAS, the related matter of *Cauchi v. L'Oreal USA, Inc.*, No. 22-cv-3926-JPC was filed on May 13, 2022;

WHEREAS, both matters contain substantially similar allegations and plead substantially similar causes of action;

WHEREAS, the matters share a common question of fact or law, as required by Fed. R. Civ. P. 42;

WHEREAS, Defendant L'Oreal USA, Inc. filed a motion to dismiss in the *Hicks* matter on June 24, 2022;

WHEREAS, Plaintiffs Zaida Hicks and Stephanie Vargas must file an opposition to the motion to dismiss on or before July 22, 2022;

WHEREAS, Defendant L’Oreal USA, Inc. has not yet moved to dismiss in the *Cauchi* matter but intends to do so;

WHEREAS, the plaintiffs in either matter have not yet amended their complaints as a matter of course;

NOW THEREFORE, it is hereby STIPULATED and AGREED that the above-captioned matter should be consolidated pursuant to Fed. R. Civ. P. 42(a), and that, if so, Plaintiffs shall file a consolidated amended complaint as a matter of course on or before August 23, 2022, and that Defendant shall respond by answer or pre-motion letter by September 13, 2022.

Dated: July 19, 2022

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THE COURT, having considered the STIPULATION of the parties, orders that the above-captioned matters be consolidated pursuant to Fed. R. Civ. P. 42(a); that Plaintiffs shall file a consolidated amended complaint as a matter of course on or before August 23, 2022; and that Defendant shall respond by answer or pre-motion letter by September 13, 2022.

IT IS SO ORDERED.

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Hon. John P. Cronan